IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

SHANE GALITSKI, RICHARD	§	
TALIAFERRO and	§	
BRIAN NEWBOLD, Individually	§	
and on behalf of All Others Similarly	§	
Situated,	§	
	§	CIVIL ACTION NO.
Plaintiffs,	§	
	§	3:12-CV-4782-D
V.	§	
	§	
SAMSUNG TELECOMMUNICATIONS	§	
AMERICA, LLC,	§	
	§	
Defendant.	§	

DEFENDANT'S FIFTH UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFFS' MOTION TO COMPEL

TO THE COURT:

Defendant Samsung Telecommunications America, LLC ("STA") files its Fifth Unopposed Motion to Extend the Deadline to Respond to Plaintiffs' Motion to Compel STA to Comply with Topic 12 of Plaintiffs' Amended Notice of F.R.C.P. Rule 30(b)(6) Deposition [Docket No. 108], and in support thereof, STA respectfully shows the Court as follows:

- 1. On April 9, 2014, Plaintiffs filed Plaintiffs' Motion to Compel STA to Comply with Topic 12 of Plaintiffs' Amended Notice of F.R.C.P. Rule 30(b)(6) Deposition.
- 2. STA's original deadline to respond was April 30, 2014. STA previously filed four motions to request that the Court extend its deadline to respond through May 28, 2014.
 - 3. STA now requests an additional seven days to file its response, until June 4, 2014.

4. As indicated in the Certificate of Conference below, Plaintiffs do not oppose the

relief requested by this motion.

5. This extension is sought for good cause. Counsel for Defendant STA is

continuing to work with Counsel for Plaintiffs to resolve the issues presented by Plaintiffs'

motion to compel. Counsel for Defendant STA anticipates that a resolution of Plaintiffs' motion

to compel will be reached within the additional time sought by this unopposed request for

extension. Defendant STA produced certain documents requested by Plaintiffs. Counsel for

Defendant STA and Counsel for Plaintiffs are now discussing the scope and the logistics of a

potential deposition related to Topic 12 of Plaintiffs' Amended Notice of F.R.C.P. Rule 30(b)(6)

Deposition. Counsel for Defendant STA believes that additional time will likely facilitate

resolution of the issues presented by Plaintiffs' motion without the necessity of court

intervention.

6. Accordingly, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), STA

respectfully requests that this Court extend the deadline for STA to file its response to Plaintiffs'

Motion to Compel STA to Comply with Topic 12 of Plaintiffs' Amended Notice of F.R.C.P.

Rule 30(b)(6) Deposition until June 4, 2014.

DEFENDANT'S FIFTH UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFFS' MOTION TO COMPEL

Date: May 2	8, 2014	Respectfully submitted.

/s/ John Volney

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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Plaintiffs' counsel regarding the matters at issue in this motion. During that conference, counsel indicated that Plaintiffs are not opposed to the relief sought herein.

Certified to on May 28, 2014, by

<u>/s/Alan Dabdoub</u> Alan Dabdoub

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via the Court's ECF system on May 28, 2014.

/s/ John Volney	
John Volney	